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VIA ECF

U.S. District Court – E.D.N.Y.
225 Cadman Plaza East
Brooklyn, NY 11201
Attn: Honorable District Judge Pamela K. Chen

**Re: Ugwudiobi et al v. International Trendz, LLC d/b/a Presidential Security Co.
Civil Case No. 22-cv-4930 (the “Ugwudiobi Action”) and Odom, et al. v.
International Trendz, LLC, et al. – Civil Case No. 1:23-cv-828, (the “Odom Action”)**

Dear District Judge Chen:

This firm, and Levine & Blit, PLLC, represent the plaintiffs Jason Odom and Sahara Jackson in the above-referenced civil action.

On June 6, 2023, this Court issued an Order consolidating the two above referenced matters by holding, among other things, that the Odom Action and Ugwudiobi Action reveal virtually identical factual and legal questions; thereby warranting consolidation of the actions.

As a result, the Clerk of the Court was respectfully directed to consolidate the two actions and require that all filings to be made only in the Ugwudiobi Action. Nonetheless, to date, our law firms have not been receiving any “bounce back” notifications in the Ugwudiobi Action. Our offices also did not receive the “bounce back” or other notification, if any, from the Court concerning the So-Ordering of a briefing schedule for the FLSA collective certification motion that Ugwudiobi counsel served on the parties, and was apparently So-Ordered by this Court in or around June 15, 2023. Indeed, the FLSA collective certification motion, and briefing schedule, was not even discussed with the parties or Court during our Status Conference before Magistrate Pollak on June 8, 2023; therefore, we were caught off guard by this briefing schedule, which made us look further into the Court’s docket and our omission from same.

As of date, the ECF/CM system still does not set forth our appearance in the Ugwudiobi Action docket and also does not include our firms as attorneys of record receiving any notices for either the Ugwudiobi Action or Odom Action.

Accordingly, it is respectfully requested that the Clerk of the Court be directed to add our firms as attorneys of record to the Ugwudiobi Action and provide us with the requisite “bounce back” notifications so that we can be made privy to all filings in the Ugwudiobi Action.

Finally, it is also requested that a new briefing schedule concerning the collective certification motion be entered into, extending all deadlines by at least 30-days, including a time for the plaintiffs in the as the Odom Action to join in such motion, as such time will allow for our office to work with counsel on the Ugwudiobi Action concerning a potential agreement on the foregoing.

Thank you for the Court’s time and attention to this matter.

Respectfully submitted,

Bashian & Papantoniou, P.C.

/s Erik M. Bashian

Erik M. Bashian, Esq.

To: All Attorneys of Record